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January 13, 2021

By Electronic Mail and CM/ECF Posting

The Honorable Mary Kay Vyskocil
United States District Court
500 Pearl Street, Room 2230
New York, New York 10007-1312

Re: Shatsky, et al. v. PLO, et al., Case No. 18 Civ. 12355 (MKV)

Dear Judge Vyskocil:

We write on behalf of Plaintiffs in response to Defendants' January 8, 2021 letter ("Ltr.") (Dkt. No. 56), attaching a copy of the brief they filed before Judge Daniels in *Mark I. Sokolow, et al. v. The Palestine Liberation Organization, et al.*, Case No. 04 Civ. 397 (GBD) ("*Sokolow*"), concerning the question whether they have consented to personal jurisdiction under the Promoting Justice and Security for Victims of Terrorism Act, Pub. L. 116-94, § 903 (the "PSJVTA").

As we have stated previously, Plaintiffs' position is that the parties to this action should litigate the question whether Defendants are subject to personal jurisdiction under the PSJVTA in this action. Thus, Plaintiffs do not believe it is necessary for Your Honor to review briefing on that issue in either *Sokolow* or *Miriam Fuld, et al. v. The Palestine Liberation Organization, et al.*, Case No. 20 Civ. 3374 (JMF), the other case in this Circuit in which Defendants are litigating the existence of personal jurisdiction under the PSJVTA. However, to the extent the Court would find it helpful to review the briefing in those actions, Plaintiffs respectfully submit that it should review *all* of the relevant papers -- not just those submitted by Defendants -- and should thus either direct Defendants to submit the PSJVTA-related filings (including declarations and exhibits) submitted by the plaintiffs in either or both of those actions, or permit Plaintiffs to do so.

Thank you for your consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to be 'Sinaiko', with a long, sweeping horizontal line extending to the right.

Stephen M. Sinaiko
Ronald F. Wick

cc: All Counsel (by CM/ECF Posting Only)